



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar Initiative,
The Self Generation Incentive Program and Other
Distributed Generation Issues

Rulemaking 10-05-004
(Filed May 6, 2010)

**REPLY COMMENTS OF THE SOLAR ALLIANCE AND THE VOTE
SOLAR INITIATIVE ON PHASE 1 ISSUES**

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December 20, 2010

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In accord with the November 9, 2010, Scoping Memo and Ruling of the Assigned Commissioner and Assigned Administrative Law Judges, the Solar Alliance¹ and the Vote Solar Initiative (collectively the Joint Solar Parties) reply to certain of the comments submitted on December 6, 2010 in the above captioned proceeding on issues contained in the July 26, 2010 “Staff Proposal for Program Modifications to the California Solar Initiative Program” which were identified in the Scoping Memo as High Priority Phase 1 issues.

I. INTRODUCTION

Review of the opening comments submitted by parties on December 6th reveals a significant amount of agreement on the manner in which the Commission should proceed on certain policy as well as operational issues pertaining to the ongoing California Solar Initiative Program (CSI). While approaching the issues from varying perspectives, what is evident is that the investor owned utilities, program administrators, and the solar industry alike realize the benefits of a well functioning CSI program and the need to assure the continuity in the gains being made in solar installations in the state once the CSI program comes to a close.

¹ The comments contained in this filing represent the position of the Solar Alliance as an organization, but not necessarily the views of any particular member with respect to any issue.

This rulemaking provides the Commission with the opportunity to modify certain aspects of the ongoing program to assure that the state achieves the most benefit during its tenancy² while also taking the first steps in establishing a post CSI world. It is with these goals in mind that the Joint Solar Parties respond to certain of the earlier submitted comments.

II. SOLAR TARIFF MODIFICATION: VIRTUAL NET METERING AND BILL CREDIT TRANSFER TARIFFS

A. Expansion of Virtual Net Metering (Sections 2.3 and 2.4)

San Diego's Gas & Electric Company's (SDG&E) comments request that the Commission explore a certain policy issue as it considers the expansion of virtual net metering. As presented by SDG&E, "the fundamental issue is that regulation should provide protection for customers who have no competitive alternative. In the case of NEM, a situation has been created that does just the opposite. NEM requires those who lack access to a competitive alternative (i.e. distributed solar), to subsidize those who have access to a competitive alternative."³ Based on this purported lack of fairness, SDG&E asserts that "while VNM may appear to make sense for low income multi-housing, SDG&E does not believe a blanket extension of VNM is appropriate without a greater understanding of the potential socio-economic impacts."⁴ SDG&E's argument regarding the purported "inequities" in California's net energy metering policy is misplaced in a discussion on the value of extending virtual net metering.

Setting aside any analysis of the validity of SDG&E's claim and accepting it at face

² In approving the CSI program the Commission noted that the goals of promoting on-site PV were to add clean, peak demand resources, to diversify the state energy portfolio, to hedge against fuel price volatility, and to reduce the need for transmission and distribution additions. *See* Decision 06- 01-024, p. 4.

³ Opening Comments of San Diego Gas & Electric Company Regarding California Solar Initiative Phase I Issues, R. 10-05-004 (December 6, 2010) (SDG&E Comments) at p.3.

⁴ SDG&E Comments at p. 4.

value, expansion of virtual net metering will not exacerbate any potential socio-economic issues related to customers who can take advantage of net metering programs and those that cannot. To the contrary it will, if anything, assist in leveling the playing field. In short, it will allow certain groups of customers who previously did not have access to solar to benefit from solar programs. Such groups of customers include tenants in apartments, condominium owners, subdivision housing and renters, to name a few. Indeed, by expanding the VNM program the Commission would be doing the very thing which SDG&E requests – to “explore alternative methods for incentivizing solar that benefit all customers as opposed to mechanisms that are inherently biased to disproportionately benefit high use customers who may have greater access to capital and financing.” VNM is one such alternative method.⁵

In this regard, the Joint Solar Parties whole-heartedly agree with the comments of the California Center for Sustainable Energy (CCSE) supporting Staff’s recommendation to expand VNM to all multitenant customers:

The goal of the CSI Program is to stimulate the adoption of solar and bring down costs associated with distributed generation, and VNM enables the market to meet these goals. Furthermore, all costs associated with the implementation of VNM are being absorbed by the general market CSI budget. Due to CPUC code 780.5 and provisions defined in SDG&E’s Rule 19, there is an ever-increasing number of multitenant properties that are individually metered. Installation of PV on multitenant properties, whether new or general market low income projects, presents similar economic and technical challenges. As we approach the post-CSI era, it is vital for incentives such as the VNM tariff to be available in order for the solar market to continue its growth and become sustainable. We would suggest VNM be available beyond properties that are receiving an incentive through the CSI Program.⁶

⁵ SDG&E Comments at p. 4

⁶ Comments of the California Center for Sustainable Energy in response to the Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges, and Request for Comment on Phase I Issues, R.10-05-004 (December 6, 2010) (CCSE Comments), at p. 4

While PG&E has raised some logistical issues which will need to be worked through (e.g., some rate schedules do not mesh with a net metering approach),⁷ they should not be perceived as a strict bar to the expansion of VNM. For the continued growth of the solar market in California, the expansion of VNM should be viewed as a critical next step.

B. Service Delivery Point as the Boundary of Eligibility for Virtual Net Metering (Section 2.2)

The Staff Report recommends that the Commission determine that the service delivery point is not the proper boundary for the VNM tariffs for affordable housing projects. Rather, Staff suggests that the Commission clarify that its use of the word “property” in D. 08-01-036 pertained to the entire affordable housing development, irrespective of its use of multiple service delivery points. Most parties submitting comments on this issue supported Staff’s recommendation. In contrast PG&E maintains that the netting of generation and load accounts behind the service delivery point is the proper application for any ongoing form of virtual net metering.⁸ Specifically, PG&E is concerned that expanding virtual net metering beyond the service delivery point may be inconsistent with California policy regarding movement of power over an integrated network and contends that “in every other instance where the legislature has provided customers with an opportunity to generate power at a given location on the utility grid and seek to have that power consumed at another location on the utility grid, the customer has been required to cover the costs of transmitting and distributing the power, and thus has received a generation only credit at the point(s) of consumption.”⁹ PG&E implies that an expansion of

⁷ Pacific Gas and Electric company’s Comments on Phase 1 Issues in the CSI/DG OIR, R. 10-05-004 (December 6, 2010) (PG&E Comments) at p. 6

⁸ PG&E Comments at p. 3.

⁹ PG&E Comments at p. 4.

VNM beyond the service delivery point necessitates the changing of the credit provided VNM customers to a generation only credit. The Joint Solar Parties strongly disagree.

VNM is not comparable to local governments installing solar at remote locations under Public Utilities Code Section 2830, one of the examples provided by PG&E where the Commission determined a generation rate was appropriate. VNM customers, even under the expanded definition supported by the Joint Solar Parties, sharing the benefits of a single solar installation would be geographically confined to a small area and not scattered throughout the city and county. Any use of the distribution or transmission systems accredited to such individuals would be minimal at best. To assess such customers with fully loaded distribution and transmission charges could effect a reverse subsidy – i.e., VNM customers would be subsidizing the distribution and transmission charges of other customers.

C. Bill Credit Transfer Tariff Option for All Multitenant Buildings (Section 2.5)

The Staff recommends providing multitenant buildings with an additional tariff option that would allow a solar system to transfer bill credits denominated in dollars to one or more benefiting accounts. While currently such tariffs (RES-BCT) are available for local government facilities, the Staff’s proposal would expand such to all multitenant buildings. In Opening Comments, the Joint Solar Parties supported the creation of another tariff option for multitenant customers that have multiple delivery points and are not eligible for VNM, but noted that due to certain deficiencies in the current RES-BCT it should not be used as a template for that new tariff.¹⁰ CCSE agrees with the Joint Solar Parties’ sentiments. CCSE, however, offers a practical solution to one of the deficiencies in the current RES-BCT – i.e., the CSI Program

¹⁰ Comments of the Solar Alliance and Vote Solar Initiative on Phase 1 Issues, R. 10-05-004 (December 6, 2010) (Joint Solar Parties’ Comments) at p. 6.

requirement capping incentives to the onsite load of the system’s physical location and not to the additional sites where there is additional load.¹¹ The Joint Solar Parties support this recommendation.

Specifically, CCSE notes that Public Resources Code 25782, subsection 5 indicates that a solar energy system receiving ratepayer funded incentives is limited to one that “is located on the same premises of the end-use consumer where the consumer’s own electricity demand is located.” If the word “premises” is interpreted to include multiple sites owned by a single entity, then a system can receive an incentive according to the total load of each facility.¹² While this interpretation of the Public Resource Code would require a modification to the CSI Handbook, it is not inconsistent with the express language of the statute and would remove a significant stumbling block for a RES-BCT type tariff being a viable option for more customers.

On a related note SDG&E asserts that to the extent that the Commission determines to proceed with a BCT option, it should await the resolution of the AB 920 proceeding to assure that “any BCT option is, in fact, consistent with the Net Surplus Compensation program.”¹³ The linkage between the two programs is not clear to the Joint Solar Parties. The Commission is not under any directive to use whatever rate is ultimately determined to be appropriate in the AB 920 program in any to be created BCT tariff, or vice versa. There is no basis for arbitrarily tying the two together.

¹¹ CCSE Comments at pp. 6-7.

¹² CCSE Comments at p. 7.

¹³ SDG&E Comments at p. 5.

III. GENERAL MARKET PROGRAM MODIFICATIONS

A. Project Inspections Process (Section 3.3)

In opening comments, the Joint Solar Parties agreed with Staff that the Commission should evaluate the cost-effectiveness of the inspection program, including a review the sampling rate. While not highlighting another aspect of Staff's proposal in its opening comments – i.e., that Program Administrators inspect all PBI systems – such a requirement seems at best premature and at worst inconsistent with the Staff recommendation that the cost effectiveness of the overall inspection program be evaluated.

In this regard, while the Program Administrators acknowledge Staff's concern that it is important to confirm that eligible equipment is installed and generating electricity they do not agree that a requirement to inspect one hundred percent of all PBI systems is a cost effective way to guarantee this assurance.¹⁴ The Joint Solar Parties agree. As noted by PG&E, project validity and quality installation assurance can be verified through random inspections in addition to validity tests performed on the production data as completed through the Measurement and Evaluation (M&E) studies, which have currently shown that PV systems are generally producing more than expected.¹⁵ Or, if the Commission should desire a more targeted approach then, as recommended by CCSE, the monthly production data received for payments can be used to ensure system output is within +/- 5 percent of the estimated kWh production calculated by the EPBB calculator. Projects where the data falls outside the tolerances or that submit inconsistent

¹⁴ See, e.g., PG&E Comments at p. 19; CCSE Comments at p.11.

¹⁵ PG&E Comments at p. 19.

data could then be inspected.¹⁶

B. EPBB Metering Cost Cap Exemption (Section 3.4)

The Staff Proposal recommends, in part, that "the Commission should eliminate the EPBB metering cost-cap exemption and require that all EPBB customers take PMRS service."¹⁷

The Joint Solar Parties, recognizing the importance of sufficient data to aid in program evaluation as well as advancement of the solar industry in general, supported the elimination of the EPBB metering cost-cap exemption and the recommendation to require that all EPBB customers take PMRS service.¹⁸ In their opening comments, however, Grid Alternatives notes that although this Staff proposals falls under the section of the report entitled "General Market Program Modifications" and not the low-income programs, its adoption may affect the low-income programs as well unless the proposal is clarified.¹⁹ As highlighted by Grid Alternatives, nearly all PMRS technologies require some form of data communication link, such as high-speed internet or cell phone service that many low-income families do not have and can not afford.²⁰ In addition, there may be ongoing services needs for the PMRS equipment. Given these additional expenses which may deter participation in the low income solar programs, the Joint Solar Parties support Grid Alternatives in its request that the requirement that EPBB customers take PMRS service not be applicable to customers participating in the low income programs.

C. Payments for Performance Based Incentive Systems (Section 3.9)

The Staff Report raised the concern that administrative cost of issuing monthly checks to

¹⁶ CCSE Comments at p. 11.

¹⁷ Staff Report at p. 31.

¹⁸ Joint Solar Parties' Comments at p. 13.

¹⁹ Comments of Grid Alternatives on Staff Proposal on Phase 1 Issues for California Solar Initiative Program Modifications, R.10-05-004 (December 6, 2010) (Grid Alternative Comments), at p. 12.

²⁰ Grid Alternative Comments at p. 12.

CSI participants who receive performance based incentives (PBI) may be too high, especially in light of the fact that small systems often generate minimal payments in any 30 day time period and thus proposed that Program Administrator should have the discretion to pay solar projects earning incentive payments of less than a certain amount on a quarterly or semi-annual basis instead of monthly.²¹ The Joint Solar Parties supported such recommendation to the extent it would actually save money and certain parameters were applied.²²

In contrast, the Program Administrators do not believe that the Staff proposal would in fact save any money and “suggest an alternative solution to require that all systems less than 30kW receive an EPBB incentive, rather than a PBI payment.”²³ The Joint Solar Parties do not support this recommendation. Receiving a performance based incentive remains an appealing alternative for many CSI participants with smaller projects.

Moreover, while Program Administrators assert that “requiring all systems less than 30kW to receive an EPBB incentive would ensure that PBI payment processing costs do not outgrow the administration budget, especially in post-CSI years,”²⁴ they do not offer any analysis of how much savings would be garnered from taking away what has been an attractive element of the program for a large percentage of the smaller systems. Finally, the Joint Solar Parties note that maintaining the incentive payment option for smaller projects would have the programmatic benefit of securing data on these smaller systems and increasing the sample

²¹ Staff Report at p. 40.

²² Joint Solar Parties Comments at pp. 16-17.

²³ CCSE Comments at p. 15; PG&E Comments at p. 22; Opening Comments of Southern California Edison Company in Response to Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges, and Request for Comments on Phase 1 Issues, R. 10-05-004 (December 6, 2010) (SCE Comments) at p. 11.

²⁴ CCSE Comments at p. 15; PG&E Comments at p. 22; SCE Comments at p 11.

population within the CSI program.

IV. MARKETING AND OUTREACH PLANS

The Joint Solar Parties supported, with limited clarifications, Staff’s recommendation that the Program Administrators file Marketing and Outreach (M&O) Plans via Advice Letter by September 30th of each year which provided sufficient details on the actual activities that will be conducted by each Program Administrator to achieve the Commission’s CSI M&O goals, as well as the budget for each activity. In this regard, the Joint Solar parties noted that it is critical that the M&O plans be monitored regularly for their effectiveness as well as the need to have regular stakeholder input to assure that the M&O Plans are changing with the changing needs of the program and that the limited budget is being used in an efficient and effective manner.²⁵

In contrast, PG&E expresses concern over the advice letter process as it “may adversely impact the PAs’ ability to implement our M&O plans if the Advice Letters were to be protested and/or suspended.”²⁶ Similarly PG&E expresses reluctance to present to stakeholders any thing but a skeletal outline of the plan before its adoption. Thus, PG&E recommends “that the PAs need only present the high level M&O objectives for the following year and not lay out the tactical activities at this workshop.”²⁷ In essence PG&E wants to remove any meaningful stakeholder input from the process. The Joint Solar Parties urge the Commission not to adopt PG&E’s recommendations. Stakeholders bring a unique and differing perspective to the process than the program administrators. As noted in opening comments, there are certain areas of marketing and outreach on which the Joint Solar Parties believe M&O activities should focus as

²⁵ Joint Solar Parties Comments at p. 20.

²⁶ PG&E Comments at p. 28. *See also* CCSE Comments at p. 28.

²⁷ PG&E Comments at p. 29.

the CSI program heads towards its later stages. Stakeholders should not be left guessing as to how the PA's are intending to implement "high level objectives", only to find out too late that the PA's M&O plans do not meet the industries or their respective customers' needs.

VI. PROGRAM BUDGETS AND RATE COLLECTION MODIFICATIONS

In addressing the current CSI budget constraints, the Joint Solar Parties agreed with the Staff recommendation that, at a minimum, the Commission should seek an amendment to Section 2851(e) of the Public Utilities Code which specifies that the total cost for the portion of the CSI program supported by the customers of SDG&E, SCE, and PG&E shall not exceed \$2.1668 billion.²⁸ Specifically, the Joint Solar Parties are recommended, consistent with the Commission's intent when it initially adopted a CSI program, that interest on customer collections, as well as other monies collected through the program (e.g., application fees) be used to increase the overall budget. The CCSE mimicked this recommendation, but added that "in order for the forfeited application fees and interest funds to have an impact on the budget shortfall, the Commission should revise the annual CSI Revenue Requirements schedule to drive forward collection, i.e., increase the rate collection amounts in the next two years. This would allow for the current interest rate to be applied against a greater dollar amount in the utility balancing accounts."²⁹ The Joint Solar Parties agree with this recommendation. As CCSE points out increasing the rate of collection amounts is warranted as the program is proceeding into the latter incentive steps and projects are be incentivized at a much more rapid pace than when the schedule was originated. These two steps of seeking legislation which would allow interest as well as other monies collected through the program coupled to be added to the budget

²⁸ Joint Solar Parties Comments at p. 24.

²⁹ CCSE Comments at p. 29.

in addition to increasing the rate of collection so as to enhance the interest generated would not increase the overall dollar amount collected from ratepayers but would infuse much needed monies in to the CSI program.

Respectfully submitted this December 20, 2010, at San Francisco, California.

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CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 20th day of
December 2010 caused a copy of the foregoing

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to be served on all known parties to R.10-05-004 listed on the most recently updated
service list available on the California Public Utilities Commission website, via email to
those listed with email and via U.S. mail to those without email service. I also caused
courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury that the foregoing is true and
correct. Executed this 20th day of December 2010 at San Francisco, California.

/s/ Melinda LaJaunie
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